

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re: James Clark

Chapter 13 no. 24-12128amc

**MOTION TO APPROVE PENNSYLVANIA HOMEOWNER
ASSISTANCE FUND(PAHAF)**

1. Debtor filed for protection under Chapter 13 on June 20, 2024.
2. Scott Waterman is the assigned trustee.
3. On June 25, 2024, the debtor received an e mail from PAHAF stating that he was approved for assistance with mortgage reinstatement funds of \$41,998.14 good through July 24, 2024. A copy of the e mail is attached as exhibit A.
4. PAHAF requires approval by the court. The Chapter 13 plan calls for the mortgage arrears of mortgagee, Select Portfolio to be paid its full arrears directly from PAHAF.

WHEREFORE the Debtor requests that this Honorable Court enter an Order approving the PAHAF assistance.

RESPECTFULLY SUBMITTED

GELLERT SEITZ BUSENKELL & BROWN, LLC

/s/ Michael A. Cataldo
Michael A. Cataldo
901 Market Street
Suite 3020, 3rd Floor
Philadelphia, PA 19107
Telephone: (215) 238-0015
Facsimile: (215) 238-0016
mcataldo@gsbblaw.com

Counsel to Respondent/Debtor